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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

Case No. 2:24-cv-1844 DJC AC P

**STIPULATION ALLOWING PLAINTIFF  
TO PROCEED PSEUDONYMOUSLY  
AND [PROPOSED] ORDER**

Judge: Honorable Allison Claire  
Trial Date: None Set  
Action Filed: July 1, 2024

Plaintiff Jane Doe #2 filed the complaint in this matter using a pseudonym and subsequently requested an order allowing her to proceed pseudonymously in public filings in this matter. (Pl.'s Mot. for Administrative Relief to Proceed by Pseudonym, ECF No. 3.) The Court granted Plaintiff's motion without prejudice to reconsideration after Defendants appeared. (Order, ECF No. 13.)

Counsel for Defendants J. Macomber, R. Montes, R. Hickethier, L. Gonzalez, L. Parker, and A. Kent (Defendants) has been informed by Plaintiff's counsel of Plaintiff Jane Doe #2's true

1 name.<sup>1</sup> While Defendants do not oppose Plaintiff proceeding pseudonymously in this proceeding,  
2 Defendants would oppose any related limitations on their ability to conduct discovery and  
3 investigate this matter, interference with the California Department of Corrections and  
4 Rehabilitation's (CDCR) ability to operate and maintain institutional security, or CDCR's or its  
5 employees' ability to assist or participate in any potential related criminal proceeding.

6 Plaintiff and Defendants Macomber, Montes, Hickethier, Gonzalez, Parker, and Kent  
7 therefore stipulate and agree as follows:

8 1. Plaintiff may proceed pseudonymously in this matter;  
9 2. No party may use Plaintiff's true name in public filings or in open court in pretrial  
10 proceedings in this matter, and instead shall refer to Plaintiff as "Jane Doe #2";  
11 3. Parties filing documents bearing Plaintiff's true name in the public record shall redact  
12 Plaintiff's true name;

13 4. If it is necessary to use Plaintiff's true name in a court filing, the filing party shall  
14 follow the procedures under Local Rule 141 and request that the document be filed under seal;

15 5. This stipulation does not limit the ability of the parties to use Plaintiff's true name  
16 and CDCR number in the course of their investigation and discovery in this matter, including but  
17 not limited to its use in interviews of potential witnesses, in correspondence as needed for  
18 litigation purposes, subpoenas to non-parties, and depositions. This stipulation also does not  
19 address or limit the parties' use of Plaintiff's true name and CDCR number outside of, and not  
20 related to, this litigation, such as for purposes of CDCR's internal investigations, CDCR and  
21 prison operations, or any potential related criminal proceedings or external investigations;

22 6. This stipulation does not address the use of a pseudonym at any trial in this matter,  
23 which the parties will address in a separate pretrial filing at the appropriate time;

24 7. By agreeing to this stipulation, Defendants do not concede or admit the truth or  
25 accuracy of any of the statements, allegations, or claims contained in Plaintiff's motion or the  
26 Declaration of Jenny Huang submitted with that motion (ECF No. 3);

27 \_\_\_\_\_  
28 <sup>1</sup> Defendant M. Johnson has not yet appeared in this action, and the Office of the  
California Attorney General does not currently represent him.

1       8. Defendants and their attorneys agree that the true name of Jane Doe #2 shall not be  
2 disclosed to Defendant Johnson, in light of his non-appearance in this case to date. In the event  
3 that Defendant Johnson does appear in this action, Plaintiff's counsel will meet and confer with  
4 him and/or his attorney regarding Plaintiff's motion to proceed by pseudonym.

5       9. The right of Defendant Johnson to oppose Plaintiff proceeding under a pseudonym,  
6 should he appear in this matter, is not affected by this stipulation; and

7       10. The parties reserve the right to seek reconsideration or modification of this  
8 stipulation should future circumstances warrant it.

9  
10 Dated: September 19, 2024

/s/ Jenny C. Huang  
(as authorized September 18, 2024)  
Jenny C. Huang  
Attorney for Plaintiff, Jane Doe #2

11  
12 Dated: September 19, 2024

ROB BONTA  
Attorney General of California  
ALICIA A. BOWER  
Supervising Deputy Attorney General  
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Deputy Attorney General

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15       /s/ Zachary Glantz

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ZACHARY GLANTZ  
Deputy Attorney General  
*Attorneys for Defendants*  
*J. Macomber, R. Montes, R. Hickethier, L.*  
*Gonzalez, L. Parker, and A. Kent*

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## ORDER

Good cause appearing, the parties' stipulation is GRANTED. IT IS SO ORDERED.

DATED: September 20, 2024

Allison Claire  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE